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Attorneys for Irving H. Picard, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and for the Estate of Bernard L. Madoff

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

ESTATE OF RICHARD L. CASH; RICHARD L. CASH DECLARATION OF TRUST DATED SEPTEMBER 19, 1994, as a joint tenant WROS; JAMES H. CASH, individually as a joint tenant WROS, and in his capacity as Trustee of the Richard L. Cash Declaration of Trust and as Personal Representative of the estate of Richard L. Cash;

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

Adv. Pro. No. 10-05044 (SMB)

DAVID CASH; JONATHAN CASH; ESTATE OF GLADYS CASH; and CYNTHIA J. GARDSTEIN, in her capacity as Personal Representative of the Estate of Gladys Cash,

Defendants.

CASE MANAGEMENT NOTICE

PLEASE TAKE NOTICE, that pursuant to the Order (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (the "Order") [Dkt. No. 3141] entered by the Bankruptcy Court in the above captioned SIPA liquidation, Adv. Pro. No. 08-01789 (SMB), on November 10, 2010, the following deadlines are hereby made applicable to this adversary proceeding:

- 1. The Initial Disclosures shall be due: April 18, 2014
- 2. The Deadline for Service of Substantive Interrogatories shall be: December 5, 2014
- 3. Fact Discovery shall be completed by: March 5, 2015
- 4. The Disclosure of Case-in-Chief Experts shall be due: May 4, 2015
- 5. The Disclosure of Rebuttal Experts shall be due: June 3, 2015
- 6. The Deadline for Completion of Expert Discovery shall be: September 1, 2015
- 7. The Deadline for Mediation Referral shall be: October 30, 2015
- 8. The Deadline to Choose a Mediator and File a Notice of Mediator Selection shall be: November 13, 2015
- 9. The Deadline for Conclusion of Mediation shall be: March 11, 2016

Dated: New York, New York March 21, 2014

BAKER & HOSTETLER LLP

By: /s/ Nicholas J. Cremona

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